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5 **FREEDOM LAW FIRM**

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11 *Attorneys for Plaintiffs Richard Klein, Raymond Urias,
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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 Richard Klein, Raymond Urias and Sandra J.
16 Gunter, individually and on behalf of all others
17 similarly situated,

18 CASE NO:2:22-cv-01392-GMN-BNW

19 Plaintiffs,
20 -vs.-

21 **CLASS ACTION**

22 National Collegiate Student Loan Trust 2005-3, *et
al.*,

23 Defendant.

24 **STIPULATION AND ORDER FOR
EXTENDING TIME FOR PLAINTIFFS
TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

25 **(FIRST REQUEST)**

26 **Current Response Date: March 22, 2023
New Response Date: April 5, 2023**

27 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein, Raymond
28 Urias and Sandra J. Gunter (“Plaintiffs”) and Transworld Systems, Inc. (“TSI”) and
National Collegiate Student Loan Trust (“NCSLT”) 2005-2, NCSLT 2006-3, NCSLT 2007-
1, NCSLT 2007-2, and NCSLT 2007-3, and NCSLT 2007-4) (the “Trust Defendants”)
(collectively, “Defendants”) (Plaintiffs and Defendants collectively referred to as the “Parties”),

1 by and through their respective counsel of record, hereby stipulate, agree and respectfully request
2 that the Court extend the deadline for the Plaintiffs to file their responses to the Trust Defendants'
3 Motion to Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) from March 22,
4 2023 to April 5, 2023.¹

- 5 1. On December 23, 2022, Plaintiffs filed their First Amended Complaint. ECF NO. 20.
- 6 2. On December 28, 2022, Plaintiffs served the Summons and First Amended Complaint on
7 TSI. ECF No. 23.
- 8 3. On December 29, 2022, Plaintiffs served the Summons and First Amended Complaint on
9 NCSLTs. ECF No. 24.
- 10 4. Therefore, TSI's original response due date was January 18, 2023 and the Trust
11 Defendants' original response due date was January 19, 2023.
- 12 5. The Trust Defendants' counsel needed additional time to better investigate the new allegations
13 and the Parties agreed to an extension of time for Defendants to respond to the First
14 Amended Complaint through and until February 6, 2023. ECF No. 25
- 15 6. TSI counsel needed additional time to evaluate the information necessary to respond to
16 the Complaint and the Parties agreed to an extension of time for Defendant to respond to
17 the First Amended Complaint through and until February 6, 2023. ECF No. 26.
- 18 7. Defendants then needed additional time to evaluate the information necessary to
19 appropriately respond to respond to the First Amended Complaint and the Parties agreed
20 to extension of time to respond to the First Amended Complaint through and until March
21 8, 2023.

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28¹ Both NCSLT's Motion to Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) were filed on March
8, 2023.

1 8. On March 8, 2023, the Trust Defendants and TSI filed their respective Motions to Dismiss

2 Plaintiffs' First Amended Complaint ("Motions to Dismiss"). ECF Nos. 39 & 40.

3 9. Plaintiffs' deadline to respond to these Motions to Dismiss set for March 22, 2023.

4 10. The Parties have discussed extending the deadline Plaintiffs have to respond to

5 Defendants' Motions to Dismiss in light of the multiple motions to dismiss that have been

6 filed in this case and the complexity of the matter.

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8 WHEREAS, the parties hereby stipulate and agree to extend the deadline for Plaintiffs to
9 file their responsive pleading to Defendants' Motions to Dismiss (ECF Nos. 39 & 40) to
10 April 5, 2023.

IT IS SO STIPULATED.

Dated: March 20, 2023 FREEDOM LAW FIRM <u>/s/ George Haines</u> George Haines, Esq. Nevada Bar No. 9411 Gerardo Avalos, Esq. Nevada Bar No. 15171 8985 South Eastern Ave., Suite Suite 350 Las Vegas, Nevada 89123 MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC Scott C. Harris* N.C. Bar No: 35328 900 W. Morgan Street Raleigh, NC 27603 Telephone: (919) 600-5003 Facsimile: (919) 600-5035 sharris@milberg.com	Dated March 20, 2023 WRIGHT, FINLAY & ZAK, LLP <u>/s/ Ramir M. Hernandez</u> Ramir M. Hernandez, Esq. Nevada Bar No. 13146 Darren T. Brenner Nevada Bar No. 8386 7785 W. Sahara Avenue, Suite 200 Las Vegas, Nevada 89117 (702) 475-7964; Fax: (702) 946-1345 LOCKE LORD LLP <u>/s/ J. Matthew Goodin</u> J. Matthew Goodin 111 S. Wacker Drive, Suite 4100 Chicago, Illinois 60606 (312) 443-0472 jmgoodin@lockelord.com Attorneys for the Trust Defendants SESSIONS, ISRAEL & SHARTLE, LLP <u>/s/ James K. Schultz</u>
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	<p>SESSIONS, ISRAEL & SHARTLE, LLP <u>/s/ James K. Schultz</u> James K. Schultz Nevada Bar No. 10219 1550 Hotel Circle North, Suite 260 San Diego, CA 92108 Tel: (619) 758-1891 Fax: (877) 334-0661 E-mail: jschultz@sessions.legal</p> <p>SESSIONS, ISRAEL & SHARTLE, LLC <u>/s/ Bradley J. St. Angelo</u> Bryan C. Shartle – <i>Pro Hac Vice</i> Bradley J. St. Angelo – <i>Pro Hac Vice</i> 3850 N. Causeway Blvd., Suite 200 Metairie, LA 70002-7227 Tel: (504) 828-3700 Fax: (504) 828-3737 E-mail: bshartle@sessions.legal E-mail: bstangelo@sessions.legal</p> <p>LINCOLN, GUSTAFSON & CERCOS LLP Shannon G. Splaine, Esq. Nevada Bar No. 8241 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169-5968 Tel: (702) 257-1997 Fax: (702) 257-2203 E-Mail: ssplaine@lgclawoffice.com</p> <p><i>Attorneys for Transworld Systems Inc.</i></p>
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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: March 21, 2023